



Baldwin Hills Community Standards District Executive Summary

Background

The Baldwin Hills area has included oil and gas production since the 1920s, when the area was largely undeveloped. Today this activity operates in the midst of residential, commercial, institutional and recreational uses. In recent years, residents in the vicinity of the oil field have reported noise, odor, vibration, health, safety and visual impacts which they attributed to operation of the oil field.

In response to community concerns, the Los Angeles County Board of Supervisors adopted a series of urgency ordinances beginning in June 2006 which temporarily placed restrictions on the drilling of oil wells. The interim urgency ordinances also directed the Los Angeles County Department of Regional Planning to initiate a study to identify appropriate means for regulating the oil field.

In November 2006 the Department recommended that a Community Standards District (CSD) be created to provide specific standards for oil and gas production operations in the Baldwin Hills. This approach was recommended because it would provide enhanced oil production regulations and require that an environmental document be prepared under the California Environmental Quality Act (CEQA) guidelines.

On March 6, 2007, pursuant to Section 22.44.040 of the County Code, the oil field operator, Plains Exploration and Production Company (PXP), filed an application to establish the Baldwin Hills CSD for the portion of the oil field that is in unincorporated land under the jurisdiction of the County. PXP developed a draft Baldwin Hills CSD using an outline provided by the Department of Regional Planning. This applicant-proposed CSD was used as the starting point to begin the environmental analysis and develop a comprehensive, fully mitigated CSD.

On March 6, 2007, the County also entered into a Three Party Agreement with PXP to contract with Marine Research Specialists, an EIR consultant, to prepare an Environmental Impact Report (EIR) for the Baldwin Hills CSD. The County then partnered with the EIR consultant to hold a series of outreach meetings with residents and other stakeholders to discuss their concerns regarding the oil field. This input formed the basis for the EIR analysis, which had the following three main goals:

1. Provide the public and decision makers with detailed information about the current and future operations at the Inglewood Oil Field;
2. Identify potential environmental impacts from future oil development activities; and
3. Assess if the applicant-proposed CSD had the necessary development standards, operating requirements and procedures to mitigate potential environmental impacts.

The Los Angeles County Regional Planning Commission (RPC) held six public hearings concerning the Baldwin Hills CSD and EIR. Following the RPC public hearings and numerous meetings with stakeholders and public agencies, the Department of Regional Planning, in consultation with the EIR consultant, prepared four revisions to the Draft Baldwin Hills CSD. These revisions were made to incorporate mitigation measures identified in the Draft EIR and address issues expressed by the community during the public hearing process. On October 8, 2008, the RPC closed the public hearing and voted to recommend approval of the CSD and certification of the Final EIR.

On October 21, 2008 the Los Angeles County Board of Supervisors held a public hearing to consider the Baldwin Hills CSD and Final EIR. After three hours of public testimony, the Board voted to certify the Final EIR and indicated its intent to approve the CSD with certain revisions, and instructed County Counsel to make those revisions to the CSD. On October 28, 2008, after hearing additional testimony, the Board of Supervisors voted to approve the CSD on consent.

Baldwin Hills CSD Highlights

The purpose of the CSD is to establish regulations, safeguards and controls over activities related to drilling for and production of oil in the unincorporated portion of the Inglewood Oil Field. Environmental impact mitigation measures identified in the EIR have been incorporated into the CSD. The following provides a summary of the CSD framework.

Prohibited Uses

The CSD prohibits the following:

- Refining
- Drilling in Holy Cross Cemetery properties and in the small non-contiguous parcel located east of La Brea Avenue

Uses Subject to a Director's Review

The CSD allows oil production operations through a Director's Review procedure provided operations comply with development standards, operating procedures and requirements of the CSD. Oil production operations include drilling, re-drilling, re-working, oil extraction, and processing of crude oil to the initial separation of oil, gas and water. The CSD requires that the oilfield operator submit a Director's Review application pursuant to Part 12 of Chapter 22.56 of the County Code for all proposed drilling, re-

drilling, installation of ancillary equipment and structures, and construction work associated with facility maintenance. Director's Review applications for drilling and re-drilling may only be approved if the subject wells are first approved as part of an Annual Drilling Plan. The number of drilling and re-drilling applications that can be approved through a Director's Review procedure is subject to the following limits:

- A maximum of 24 wells (includes newly drilled wells and re-drilling of existing wells) for the first year following the effective date of the CSD
- A maximum of 53 wells per year (includes newly drilled and re-drilling of existing wells)
 - A maximum of 45 of those wells may be newly drilled wells
- A maximum of 600 wells may be approved through a Director's Review procedure over a 20 year period following the effective date of the CSD

Uses Subject to a Conditional Use Permit

The CSD allows the following activities subject to a Conditional Use Permit pursuant to Part 1 of Chapter 22.56 of the County Code:

- Drilling or redrilling that exceeds the maximum number of wells allowed with a Director's Review
- Stream drive plant
- New tanks with a capacity of greater than 5,000 barrels

Development Standards, Operating Procedures and Requirements

The CSD includes mitigation measures identified in the EIR as well as additional provisions to address community concerns. The following list highlights provisions included in the CSD to address community concerns generally grouped as "sights, sounds, smells and safety" at the oil field:

Sights

- The operator is required to prepare a Master Landscaping Plan to beautify and screen the oil field consistent with the Baldwin Hills Conceptual Landscape Plan prepared by Mia Lehrer and Associates; landscaping must be completed in phases within a two to five year period following plan approval; the County may withhold drilling and re-drilling permits if landscaping is not in place at the end of the five year period; compliance with the approved Landscape Plan must be monitored by a County-approved licensed landscape architect.
- All visible structures within the field must be painted a compatible color as approved by the Director of Regional Planning within two years of CSD adoption.
- Lighting must be screened to avoid off-sight spill over.
- The oil field must be maintained in a clean and orderly condition, free from accumulations of garbage, refuse, and other wastes, and free from debris and vegetation overgrowth
- All equipment must be decommissioned and removed from the field once it reaches the end of its useful economic life

Sounds

- Noise must be limited to 5dBA above the baseline established in the EIR
- Pure tones as heard from the developed areas must be prohibited
- An approved Quiet Mode Drilling Plan between the hours of 6pm to 8am must be enforced.
- Regular maintenance of all noise producing equipment to minimize noise from worn parts is required.
- Backup alarms must be disabled between the hours of 8pm and 8am.
- Prohibit deliveries to the oil field between the hours of 8pm and 7am Monday through Saturday; prohibit deliveries between the hours of 8pm and 9am on Sundays or legal holidays
- Deliveries to the oil field within 500 feet of any residential property between the hours of 5pm and 7am Monday through Saturday and deliveries to such areas between 5pm and 9am on Sundays or legal holidays are prohibited.
- Construction activity between the hours of 7pm and 7am is prohibited.
- Construction equipment must be selected for low-noise output; all equipment powered by internal combustion engines must be properly muffled and maintained
- Well reworking operations between the hours of 7pm and 7am is prohibited
- Unnecessary idling of construction equipment is prohibited
- On-going noise monitoring by an independent qualified acoustical engineer is required

Smells

- The following setbacks for new wells are required:
 - 400 feet from developed areas
 - 20 feet from public roadways
- Use of portable flare for drilling in the nodular shale and the availability of a portable flare for all other drilling is required
- Pressure monitoring for all oil storage tanks, and corrective action in the event pressure falls below 10% of tank pressure, to avoid accidental releases is required
- Air quality monitors at the gas plant and at drilling and reworking sites are required
- Annual soil gas vapor probe tests for existing abandoned wells are required
- Tier II engines and diesel catalysts for drill rigs are required
- Tier III engines for off-road construction equipment are required
- Construction of major facilities must be staggered to avoid construction related dust impacts
- Odor suppressants at the biofarms and drilling mud shaker tables are required
- Use of closed systems for all produced water and crude oil associated with production processing and storage is required
- Maintenance of a meteorological station in collaboration with CalTech is required; that meteorological data must be assessed every five years to determine if a new health risk assessment is needed
- Compliance with approved Fugitive Dust Control Plan is required
- Compliance with approved Air Quality Monitoring Plan is required

- Compliance with the approved Odor Minimization Plan

Safety

- Propane and natural gas liquid bullets must be fire-proofed and equipped with an automatic deluge system
- Maintenance and implementation of an Emergency Response Plan is required
- The establishment of a community alert notification system to notify area residents in the event of an emergency arising at the oil field is required
- All oil tank areas must have secondary containment capability of holding 110% of the largest tank volume
- All retention basins are required to be adequately sized to handle a 100-year storm event plus potential spill of the largest tank
- All above ground piping must be protected by basins or secondary containment
- Annual ground movement surveys are required to include a property damage report if surveys indicate ground movement above specified thresholds; property damage reports must be reviewed by the Los Angeles County Department of Public Works in consultation with the State of California's Division of Oil, Gas and Geothermal Resources (DOGGR)
- A fault study for permanent structures in the Alquist-Priolo Fault Zone (established by the State for areas near active fault lines) is required; permanent structures within 50 feet of an active fault are prohibited
- A site-specific geotechnical investigation is required for all proposed permanent structures
- A security guard is required at the oil field 24 hours a day
- A program to detect bottom leaks on all tanks is required

CSD Monitoring and Enforcement

Department of Regional Planning

CSD implementation will require collaboration between different sections within the Department of Regional Planning.

Land Development Coordinating Center is responsible for reviewing the Director's Review applications required by the CSD. Such applications also include submittal of the plans required by the Implementation Section of the CSD (subsection L).

Enforcement Section is responsible for monitoring and enforcing CSD compliance. This involves confirming submittals and required actions, coordinating with appropriate public agencies to perform field investigations, reviewing monthly compliance reports prepared by the on-site Environmental Compliance Coordinator and chairing the Community Advisory Panel (CAP) and the Multiple Agency Coordination Committee (MACC).

Community Studies I Section was involved with drafting the CSD, and will be available for on-going consultations on CSD implementation.

The Environmental Compliance Coordinator (ECC) is a third party consultant that will report directly to the Department of Regional Planning. The ECC's duties will include assistance with Director's Review applications and on-going environmental compliance monitoring, including on-site monitoring of drilling, re-drilling and construction activity.

Multiple Agency Coordination Committee (MACC)

CSD implementation will also require collaboration between local, regional and state agencies with regulatory authority over oil operations in the Baldwin Hills. The MACC was established to facilitate communication between these agencies, and to provide the Department of Regional Planning with technical assistance in its review of plans and programs required by the CSD. MACC meetings will be used to discuss CSD implementation and technical issues that may arise during review of required plans. The Environmental Compliance Coordinator will be invited to discuss issues that arise with plan review criteria and enforcement actions.

Community Advisory Panel (CAP)

The CAP will provide a mechanism for the community to have a direct line of communication with the County and the oil field operator, and allow stakeholders to provide input and discuss issues regarding operations at the oil field. Through the CAP, the community will play an important role in on-going monitoring by functioning as "eyes and ears" for the County, informing the Department of Regional Planning about development standards that may or may not be working, and informing the operator about issues of concern to the community.